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 Keast, Jeremy Tafelmeyer, Zachary Mahon,
 Megan Penneau, and Michael Minev*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

RONALD SANTOS,

Plaintiff,

v.

KENNETH ANNIKOS, *et al.*,

Defendant.

Case No. 3:23-cv-00281-MMD-CSD

**DEFENDANTS' MOTION FOR
 EXTENSION OF TIME TO FILE A
 RESPONSE TO PLAINTIFF'S
 MOTION TO COMPEL DISCOVERY
 [ECF No. 150]**

Defendants, Lorenzo Villegas, Joseph Benson, Gaylene Fukagawa, John Keast, Jeremy Tafelmeyer, Zachary Mahon, Megan Penneau, and Michael Minev, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Kyle L. Hill, Deputy Attorney General, hereby move this Court for an extension of time to file their Response to Plaintiff's Motion to Compel Discovery [ECF No. 150].

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL ANALYSIS

This is a *pro se* prisoner 42 U.S.C. § 1983 civil rights complaint brought by offender, Ronald Santos (Santos). On April 18, 2025, Plaintiff filed a Motion to Compel Discovery Disclosures for Michael Minev and John Keast, (PRODUCTION OF DOCUMENTS) Pursuant to Fed.R.Civ.P., RULE 37 and LR 26-6(c). ECF No. 150.

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II. ARGUMENT

Defense counsel respectfully requests an additional seven (7) day extension of time to file Defendants' response to Plaintiff's Motion to Compel from the current deadline of May 2, 2025, until May 9, 2025, although undersigned counsel believes the response will be ready to file prior to the proposed extended date.

Defense Counsel has been diligently working on this matter, however, due to a number of other deadlines occurring simultaneously on the same day, May 2, 2025, including a dispositive motion in USDC Case No. 3:23-cv-00269-MMD-CLB, James Edward Scott, III, v. Melissa Michell, *et al.*, and an objection to Report and Recommendation in USDC Case No. 3:23-cv-00231-ART-CLB, James Edward Scott, III, v. Michell, *et al.*, defense counsel has not been able to have this opposition to Plaintiff's motion ready to file.

Additionally, defense counsel has been forced to work from home since April 28, 2025, due to remodeling (installation of new office equipment and furniture), which has had an impact on counsel's schedule due to technical delays. Defendants request an additional seven (7) days to file their opposition to Plaintiff's motion to compel, but undersigned counsel believes Defendants' response will be ready to file prior to the proposed extended deadline.

Federal Rule of Civil Procedure 16(b) allows parties to request extensions of deadlines set in the Court's scheduling order. Good cause exists for the extension. LR 26-3. Counsel for Defendants needs additional time due to unforeseen filings and responses in other matters which have unfortunately resulted in some delays in counsel's normal schedule.

Defendants seek an additional seven (7) days to file their response to Plaintiff's Motion to Compel Discovery (ECF No. 150). Defendants assert the requisite good cause is present to warrant the requested extension of time. This is the first request to extend the subject deadline.

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1 **III. CONCLUSION**

2 Defendants respectfully request this Court extend the deadline for Defendants to
3 respond to Plaintiff's Motion to Compel (ECF No. 150), which was filed on April 18, 2025.
4 Defendants assert the requisite good cause is present to warrant an extension of time.
5 Therefore, Defendants request additional time, up until May 9, 2025, to file their response
6 to Plaintiff's Motion to Compel.

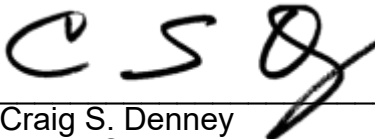
7 DATED this 2nd day of May, 2025.

8 AARON D. FORD
9 Attorney General

10 By: /s/ Kyle L. Hill
11 KYLE L. HILL, Bar No. 16094
12 Deputy Attorney General
13 *Attorneys for Defendants*

14 IT IS SO ORDERED.

15 DATED: May 2, 2025.

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18 Craig S. Denney
19 United States Magistrate Judge
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